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Patent  
Attorney's Docket No. 027260-481

**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE**

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| In re Patent Application of      | ) |                         |
| Michio Komoda                    | ) | Group Art Unit: 2825    |
| Application No.: 09/921,604      | ) | Examiner: NAUM B. LEVIN |
| Filed: August 6, 2001            | ) | Confirmation No.: 9506  |
| For: CIRCUIT MODIFICATION METHOD | ) |                         |

**REPLY BRIEF**

Commissioner for Patents  
P.O. Box 1450  
Alexandria, VA 22313-1450

Sir:

This Reply Brief is filed in response to the Examiner's Answer dated April 29, 2004.

Applicant respectfully submits that *Young et al.* is merely directed to eliminating crosstalk noise by changing the wire spacing or inserting repeaters. Nothing in *Young et al.* shows, teaches or suggest replacing a driving circuit as claimed in claim 20. Furthermore, *Tam* merely discloses how to avoid glitch in a static flop circuit. Nothing in *Tam* shows, teaches or suggest a glitch error caused in a predetermined wire by an aggressor comprising one or more wires or replacing a driving circuit for driving a predetermined wire with another driving circuit having a higher driving ability as claimed in claim 20. Therefore, the combination of *Young et al.* and *Tam*, if could be combined, would merely suggest to add additional circuits to the existing circuitry as taught by *Young et al.* in that if a staticized flop circuit is used, to control the glitch of that circuit as taught by *Tam*.

Additionally, applicant respectfully traverses the Examiner's statement that *Tam* replaces a "driver." Nowhere in *Tam* does *Tam* show, teach or suggest any drive circuit. Furthermore, nowhere in *Tam* is the word "drivability" mentioned. In fact, *Tam* only mentions the word "drive" in association with a "voltage drive" and mentions the word "driving" when it describes "driving by a clock." Otherwise, *Tam* is silent as to a driving circuit or driving ability.

Applicant respectfully points out, as the Examiner correctly noted, *Tam* is directed to preventing propagation of glitch. Applicant respectfully points out that preventing propagation of glitch is different from preventing the occurrence of glitch itself, as intended by the claimed invention. In fact, column 3, lines 22-34, discusses different ways to prevent the propagation of glitch, and specifically states "any reduction in glitch magnitude is minimal." Therefore, clearly increasing the size of the buffer in *Tam* does not prevent the occurrence of glitch.

In the Examiner's Answer, the Examiner has stated on pages 3, 6 and 7 a) that it is well known that a driver or buffer can be sized up or down, b) that sizing up means that making the driver or the buffer larger increases drivability, and c) because drivability is increased, to change one driver (driving circuit) for another one is also well known. Applicant respectfully submits that the Examiner is in essence arguing that when an effect (i.e., driving ability increases) occurs by a well known method, another method which results in the same effect is therefore also well known. Applicant respectfully submits that this reasoning is not correct nor logical. Applicant respectfully requests the Examiner explain why a person of ordinary skill in

the art would change one driving circuit for another driving circuit merely because driving ability is changed.

As discussed in the Appeal Brief, *Young et al* merely discloses inserting buffer circuits into a wire while *Tam* merely is directed to preventing propagation of glitch. Thus, neither reference shows, teaches or suggests how to prevent glitch. Thus, the combination of *Young et al* and *Tam* would merely suggest to add additional circuits to the existing circuitry as taught by *Young et al*, and that if a staticized flip-flop circuit is used, to control the propagation of glitch of that circuit as taught by *Tam*. Thus, nothing in the combination of *Young et al* and *Tam* shows, teaches or suggests replacing a driving circuit with another one having a higher driving ability as claimed in claim 20.

For all of the above stated reasons, applicant respectfully requests the Honorable Board of Patent Appeals and Interferences reverse the Examiner's decision in this case, since applicant respectfully submits that the final rejection of claims 20-21 is in error. Therefore, applicant respectfully submits that claims 20-21 should be allowed.


In the event that this paper is not timely filed within the currently set shortened statutory period, applicant respectfully petitions for an appropriate extension of time. The fees for such extension of time may be charged to our Deposit Account No. 02-4800.

In the event that any additional fees are due with this paper, please charge  
our Deposit Account No. 02-4800.

Respectfully submitted,

BURNS, DOANE, SWECKER & MATHIS, L.L.P.

Date: June 29, 2004

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